



January 18, 2019

Kim Harrington
Acting Principal Director, Defense Pricing and Contracting
Defense Pricing and Contracting
3060 Defense Pentagon
Room 3B938
Washington, DC 20301-3060

RE: January 3, 2019 Public Meeting on Proposed Changes to Contract Financing

Dear Mr. Harrington,

At the January 3, 2019 public meeting you expressed the continued desire to capture and assess company level performance data. You also raised that the types of items the department is interested in measuring on an aggregate basis were identified in the previous draft proposed rule.

We have included a list of concerns below we have with the on-time delivery metric and the MOCAS source data:

1. What systems would be used to capture aggregated company/sector performance data?
2. Regarding On-Time-Delivery metrics, the current MOCAS system treats supplies differently than services. How would delivery of services be measured?
3. Services are often miscoded as supplies. Is there a fix for this or a procedure to rectify?
4. Repair of Repairable UCA items often have place-holder delivery dates entered by the government not agreed to by the company.
5. Travel has been captured as a deliverable item on some contracts with delivery dates entered by the government not agreed to by the company.
6. Delivery impacts due to late U.S. Government GFP are not updated in the system.
7. There is no credit for on-time-delivery of partial deliveries (i.e., 8 out of a lot of 10).
8. There is no credit or benefit for early deliveries to offset a late delivery.
9. Administrative processes are unclear.
10. Contractual changes are not accurately reflected due to a 30-day or more lag time.
11. There is no ability to revise previous months' metrics.
12. It is costly and time consuming to fix the numerous issues with the data reported out of the DoD system utilized to capture on-time delivery, a 60-year-old data system.

If you or your staff have any questions, please me at whallman@ndia.org or (703) 247-2595.

Sincerely,

Wes Hallman
Senior Vice President of Policy
NDIA